West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 2, 2016.

Permit Number: **R30-10700182-2016**
Application Received: **June 15, 2020**
Plant Identification Number: **03-54-10700182**
Permittee: **The Chemours Company FC, LLC**
Facility Name: **Washington Works**
Business Unit: **Fluoropolymers (Part 2 of 14)**
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM04 Revised: October 27, 2020

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions:	Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description
Within the Fluoropolymers Business Unit, there are the following Fluoroproduct production areas: C1, C2, C3, T1-T4 and T7, T5, and T6. Each area produces a product or family of products by varying operating conditions and small adjustments to raw material ratios or material feed rates.

Proposed Modification
The purpose of this action is to change Interlock Settings in Condition 4.2.2 for Dryer Scrubbers C1FSC2 and C1FSC3.

Emissions Summary
There will be no changes of permitted emissions as a result of this minor modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs. Therefore, Chemours Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders associated with this minor modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-2365K	August 5, 2020	
R13-2365L	August 11, 2020	

Determinations and Justifications

Changes made to the Title V Permit as part of this minor modification are summarized below:

1. **45CSR13, Permit Nos. R13-2365K and R13-2365L**.
   The Chemours Company FC, LLC (Chemours) filed a request to revise the Interlock Settings from NSR Permit R13-2365J Condition B.3 for Dryer Scrubbers C1FSC2 and C1FSC3.

   The facility performed voluntary stack testing for the control efficiency of the scrubber train on C1FS in the C1 area on December 18, 2019. The report for the testing results was given to the Agency on May 1, 2020, addressed to R. Fenton and R. Johnson of WV-DAQ. Emissions testing focused on the recovery capabilities of the train for VOC materials, as the recovery of these materials were the focus of the changes in the C1FSC2 scrubber temperature. For purposes of the test, all detected vapor species were reported as VOC at the exit (C1FSE). The focus of the testing was on VOC but an examination of the operation of the air pollution control device train shows that with a bag filter and multiple scrubbers, and VOC material that does not form particulate during the recovery of it, the facility will not have any difficulty meeting the existing limitations for particulate emissions.

The replacement of the minimum temperature exiting the scrubber C1FSC2 with a maximum temperature limit reflects a tuning of the control system for the current operation of the facility. The previous lower limit was to prevent sub-micron particulate formation that has been eliminated due to a recipe change in the manufacture of the polymer. The new upper limit reflects enhanced material capture by operation of the C1FSC2 scrubber at a lower temperature (previous operation was at a nominal 90 degrees C or higher) coupled with increased reliability of the APCD train due to the capture of sticky resides in C1FSC2 rather than allowing them to accumulate in the duct work after C1FSC2 and in C1FSC3 impairing device performance. The facility anticipates the operations will continue to work to improve both through-put of the process and emissions control capabilities. Current monitoring requirements found in R13-2365J-B.3 Table B.3(a), once amended to reflect the changes proposed above, and coupled with the required retest frequency linked to the through-put rate will ensure continued environmental compliance with the emission rate limitations.

The short-term start up for a temporary higher temperature is to aid in preventing ice formation in C1FSC3 during low ambient temperatures as there is no temperature conditioning on the added ambient air to the unit and water evaporation cools the gas streams colder than ambient temperatures.

Table 4.2.2.a of Condition 4.2.2 has been changed as follows:

Revised the C1FSC2 Dryer Scrubber recirculating liquid line from “20 psig” to “40 psig”.

Revised the C1FSC2 Dryer Scrubber exit gas temperature from “falls below 70°C” to “exceeds 80°C under normal operation, or above 85°C during the first two hours of start-up from the introduction of fresh polymer into the dryer.” (Note: R13-2365K erroneously stated “falls below 80°C” for the C1FSC2 Dryer Scrubber exit gas temperature. It was corrected in R13-2365L).

Revised the C1FSC3 requirement to include: “The facility may use the injection of steam to add moisture and prevent icing in cold weather.”

2. The above listed Permit has been updated to the most current version in Section 1.2.

3. “R13-2365J” has been updated to “R13-2365L” throughout the Permit.

Non-Applicability Determinations

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not applicable
Ending Date: Not applicable

Point of Contact

All written comments should be addressed to the following individual and office:

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Division of Air Quality
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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

N/A